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Three Empire State Plaza, Albany, NY 12223-1350
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October 7, 2016

Frank Peverly
Vice President, Operations
Orange & Rockland Utilities
90 West Route 59
Spring Valley, NY 10977

Dear Mr. Peverly:

Department of Public Service (DPS) Staff has undertaken a review, with the assistance of Pterra Consulting (Pterra), of two applications to interconnect photovoltaic (PV) projects submitted by Columbia University and Sun Edison to Orange & Rockland Utilities (ORU) for analysis and approval under the New York Standardized Interconnection Requirements (SIR). In the most recent Coordinated Electric System Interconnection Reviews (CESIR) performed for these projects, ORU determined that additional Anti-Islanding and Substation Backfeeding protection was needed for the Lamont Doherty 2 project and additional Anti-Islanding protection was needed for the Lamont Doherty 3 project.

Pterra has conducted an independent engineering review of the conclusions ORU reported in the CESIRs and has arrived at alternative approaches to interconnecting these projects. First, Pterra concludes that (1) there is no need for Substation Backfeeding protection on the Lamont Doherty 2 project, and (2) the need for additional Anti-Islanding protection could be eliminated if the same type of inverters were to be used on this project and another proposed solar project on this same circuit. For the Lamont Doherty 3 project, Pterra concludes that the risk of an unintentional island is extremely low and that additional Anti-Islanding protection is not needed. Pterra's reports, which are attached to this letter, provide the basis and rationale for Pterra's conclusions.

DPS Staff has reviewed the results of Pterra's analysis and concurs with the conclusions. Accordingly, DPS Staff recommends that ORU remove the requirements for additional Substation Backfeeding protection from the Lamont Doherty 2 project and the additional Anti-Islanding protection from the Lamont Doherty 3 project as recommended in the Pterra report.

Please respond within five business days and indicate ORU's position with respect to Pterra's analysis and DPS Staff's recommendations. ORU's response should also indicate the company's plan of action. If you have any questions, I can be reached at (518) 486-2498. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Worden". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael Worden
Deputy Director - Electric